

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHAW FAMILY ARCHIVES, LTD.,
BRADFORD LICENSING, INC., JAMES E.
DOUGHTERY, and VALHALLA
PRODUCTIONS, INC.,

Plaintiffs / Consolidated Defendants,
v.

05 CV 3939 (CM)

CMG WORLDWIDE, INC., an Indiana Corporation
and MARILYN MONROE, LLC, a Delaware Limited
Liability Company,

Honorable Colleen McMahon

Defendants / Consolidated Plaintiffs.

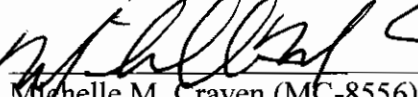
NOTICE OF MOTION FOR ADMISSION PRO HAC VICE

PLEASE TAKE NOTICE that, upon the Declaration of Michelle M. Craven submitted herewith, Defendant / Consolidated Plaintiff, MARILYN MONROE, LLC ("MML"), moves this Court, unopposed, on a date to be determined by this Court, at the United States Courthouse, 300 Quarropas Street, White Plains, New York 10601, for an Order pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, admitting Theodore J. Minch Pro Hac Vice.

Plaintiffs / Consolidated Defendants' counsel was made aware of this motion and has stated that he has no opposition to the Pro Hac Vice admission.

Dated: New York, New York
August 10, 2007

GIBSON, DUNN & CRUTCHER LLP


Michelle M. Craven (MC-8556)
200 Park Avenue, 47th Floor
New York, New York 10166
(212) 351-4000

FILED
U.S. DISTRICT COURT
2007 AUG 13 PM 12:14
S.D. OF N.Y.

AUG 13 2007

05-08

6237601

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
SHAW FAMILY ARCHIVES, LTD.,	:	
BRADFORD LICENSING, INC., JAMES E.	:	
DOUGHTERY, and VALHALLA	:	
PRODUCTIONS, INC.,	:	
	:	
Plaintiffs / Consolidated Defendants,	:	05 CV 3939 (CM)
viii.	:	
	:	
CMG WORLDWIDE, INC., an Indiana Corporation	:	Honorable Colleen McMahon
and MARILYN MONROE, LLC, a Delaware Limited	:	
Liability Company,	:	
	:	
Defendants / Consolidated Plaintiffs.	:	
	:	
-----X		

ORDER

Upon consideration of the Declaration of Michelle M. Craven and the Declaration of Theodore J. Minch, and good cause having been shown, it is SO ORDERED that Theodore J. Minch is admitted to the bar of this Court Pro Hac Vice this _____ day of _____, 2007.

United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
SHAW FAMILY ARCHIVES, LTD.,	:	
BRADFORD LICENSING, INC., JAMES E.	:	
DOUGHTERY, and VALHALLA	:	
PRODUCTIONS, INC.,	:	
	:	
Plaintiffs / Consolidated Defendants,	:	05 CV 3939 (CM)
vi.	:	
	:	
CMG WORLDWIDE, INC., an Indiana Corporation	:	Honorable Colleen McMahon
and MARILYN MONROE, LLC, a Delaware Limited	:	
Liability Company,	:	
	:	
Defendants / Consolidated Plaintiffs.	:	
	:	
-----X		

DECLARATION OF PERSON MOVING ADMISSION

Michelle M. Craven, being duly sworn, says:

I. I am an associate of the firm of Gibson, Dunn & Crutcher LLP, counsel for Defendant / Consolidated Plaintiff, MARILYN MONROE, LLC ("MMD") in the above-captioned action. I have been a member of the bar of this Court since December 2, 2003. I make this declaration in support of Defendant / Consolidated Plaintiff's motion, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, for the admission of Theodore J. Minch to the bar of this Court Pro Hac Vice.

2. Theodore J. Minch is a partner associate of the firm Sovich Minch, LLP, counsel for Defendants / Consolidated Plaintiffs CMG and MML in this action. Mr. Minch is a member in good standing of the bar of the State of Indiana. (See Certificate issued by the Supreme Court of the State of Indiana, dated August 6, 2007, attached hereto). Mr. Minch is familiar with the Federal Rules of Civil Procedure and he has familiarized himself with the Rules of this Court.

3. Plaintiffs / Consolidated Defendants' counsel was made aware of this motion and has stated that he has no opposition to the Pro Hac Vice admission.

4. Accordingly, I respectfully request that Mr. Minch be admitted to the bar of this Court Pro Hac Vice.

Dated: New York, New York
August 10, 2007

GIBSON, DUNN & CRUTCHER LLP

A handwritten signature in black ink, appearing to read "Michelle M. Craven", is written over a horizontal line.

Michelle M. Craven (MC-8556)

200 Park Avenue, 47th Floor

New York, New York 10166

(212) 351-4000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
SHAW FAMILY ARCHIVES, LTD.,	:
BRADFORD LICENSING, INC., JAMES E.	:
DOUGHTERY, and VALHALLA	:
PRODUCTIONS, INC.,	:
	:
Plaintiffs / Consolidated Defendants,	:
vii.	:
	:
CMG WORLDWIDE, INC., an Indiana Corporation	:
and MARILYN MONROE, LLC, a Delaware Limited	:
Liability Company,	:
	:
Defendants / Consolidated Plaintiffs.	:
	:
-----X	

05 CV 3939 (CM)

Honorable Colleen McMahon

DECLARATION OF PARTY SEEKING ADMISSION

Theodore J. Minch, being duly sworn, says:

1. I am a partner of the firm of Sovich Minch, LLP, counsel for Defendants / Consolidated Plaintiffs CMG Worldwide, Inc. ("CMG") and Marilyn Monroe, LLC ("MML") in the above-captioned action.

2. I make this Declaration in connection with the Declaration of Michelle M. Craven, dated August 8, 2007, in support of my admission Pro Hac Vice the bar of this Court for the purpose of representing Defendants / Consolidated Plaintiffs CMG and MML in this matter.

3. Plaintiffs / Consolidated Defendants' counsel was made aware of this motion and has stated that he has no opposition to the Pro Hac Vice admission.

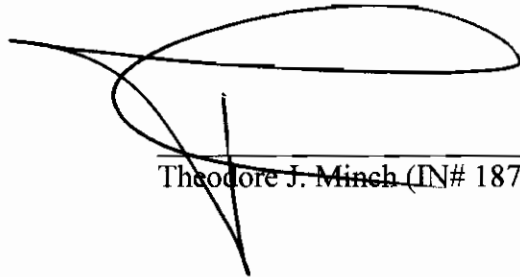
4. I have been duly admitted to practice law in the State of Indiana since October 23, 1995 and I am a member in good standing of bar of the Indiana State Bar (See Certificate issued by the Supreme Court of the State of Indiana, dated August 6, 2007, attached hereto).

5. I am familiar with the facts of the instant Case, and it would be in Defendants / Consolidated Plaintiffs CMG's and MML's interest for me to be permitted to appear and to participate in these proceedings.

6. I am familiar with the Federal Rules of Civil Procedure, and I have familiarized myself with the rules of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Indianapolis, Indiana
August __, 2007



Theodore J. Minch (IN# 18798-49)

SUPREME COURT OF THE STATE OF INDIANA



Certification

STATE OF INDIANA, SS:

I, Kevin S. Smith, Clerk of the Supreme Court
of Indiana, do hereby certify that

THEODORE JOHN MINCH

is a member of the bar of said Court since admission on
OCTOBER 23rd 1995, and is in good
standing therein.

GIVEN under my hand and the seal of said Court at Indianapolis,
Indiana, this 6th day of AUGUST, 20 07.

A handwritten signature in cursive script, appearing to read "Kevin S. Smith".

KEVIN S. SMITH
CLERK, SUPREME COURT OF INDIANA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- }
SHAW FAMILY ARCHIVES, LTD., EDITH :
MARCUS and META STEVENS, :
:

05 CV 3939 (CM)

Plaintiffs,

Honorable Colleen McMahon

v. :

CMG WORLDWIDE, INC., an Indiana Corporation :
and MARILYN MONROE, LLC, a Delaware Limited :
Liability Company, :

Defendants. :
:----- }

CERTIFICATE OF SERVICE

I, Michelle M. Craven, hereby certify, under penalty of perjury pursuant to 28 U.S.C. § 1746, that on this 10th day of August, 2007, I caused to be served by first class mail a true and correct copy of the Motion for Admission *Pro Hac Vice* of Theodore J. Minch and supporting declarations upon:

Christopher Serbagi
Law Offices of Christopher Serbagi
488 Madison Avenue, Suite 1120
New York, New York 10022

Dated: New York, New York
August 10, 2007


Michelle M. Craven